

Message

From: Michael Ritorto [mritorto@rouxinc.com]
Sent: 8/24/2017 3:15:10 PM
To: Cirian, Mike [Cirian.Mike@epa.gov]
CC: John.Stroiazzo@glencore-ca.com; Steve Wright - CFAC [swright@cfaluminum.com]; Andrew Baris [abaris@rouxinc.com]; Laura Jensen [ljensen@rouxinc.com]; cowen@mt.gov; lidewitt@mt.gov; Gunnar Emilsson [EmilssonGR@cdmsmith.com]
Subject: CFAC RI/FS Schedule Update
Attachments: RIFS Schedule Updated July 31 2017.pdf

Importance: High
Flag: Follow up

Mr. Cirian,

As you know, Roux Associates, on behalf of CFAC, has submitted the revised Phase I Site Characterization Data Summary Report (DSR) and SLERA Summary Report. These reports were revised based on the comments and discussions with the USEPA, MDEQ, and CDM Smith over the past few months. Now that you have both of those documents, we thought it would be a good time to provide an update on the CFAC schedule.

The most recent schedule update was included in the RI/FS Progress Report for July 2017 and is also attached to this email. We wanted to note the following points regarding the schedule, which is overall governed by the AOC:

- Once USEPA and MDEQ give the ok on the report revisions, Roux will produce a clean copy of each report and submit each as FINAL to the USEPA and MDEQ. **The current schedule for both reports assumes the USEPA/MDEQ would give the ok by September 1, 2017** and that we would submit the FINAL document by September 15, 2017.
- Submittal of the Final Phase I Site Characterization DSR will trigger the 60-day timeline in the AOC for the submittal of the draft Baseline Human Health Risk Assessment Work Plan (BHHRAWP). Assuming the Phase I DSR is final on September 15, 2017, this would set a date of November 14, 2017 for submittal of the draft BHHRAWP.
- Submittal of the Final SLERA summary report will trigger the 60-day timeline in the AOC for the submittal of the draft Baseline Ecological Risk Assessment Work Plan (BERAWP). Assuming the SLERA is final on September 15, 2017, this would set a date of November 14, 2017 for submittal of the draft (BERAWP).
- Following submittal of the draft BHHRAWP and the draft BERAWP, CFAC and Roux Associates will begin preparation of the draft Phase II Sampling and Analysis Plan (Phase II SAP). CFAC's objective is to submit the draft Phase II SAP in early winter so that the project team could agree on the next scope of work and that we can be in the field for Phase II during the Spring/Summer of 2018.

CFAC and Roux Associates believe that meeting the objective of being in the field in Summer of 2018 is **highly dependent on finalizing the Phase I DSR and SLERA**, and also keeping submittal of the draft risk assessment work plans and Phase II SAP on schedule. Please let us know if there is anything else you require from us or would like to discuss in more detail so we can continue to progress as planned.

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